

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

1121 PIER VILLAGE, INC,  
PENN TREATY HOMES, LLC,  
2626 FRANKFORD LLC  
285 KINGSLAND LLC,  
231 E 123 LLC,  
193 HANCOCK, LLC

Debtors

1121 PIER VILLAGE, INC,  
PENN TREATY HOMES, LLC,  
2626 FRANKFORD LLC  
285 KINGSLAND LLC,  
231 E 123 LLC,  
193 HANCOCK, LLC

Plaintiffs

Vs.

SHARESTATES INTERCAP LINE,  
LLC, SHARESTATES INVESTMENTS  
LLC, ATLANTIS NATIONAL  
SERVICES, INC.,  
RAYMOND DAVOODI, RADNI  
DAVOODI, ALLEN SHAYANFEKR

Defendants

**Chapter 11  
Lead Case No. 21-11466 (ELF)**

**(Joint Administration Requested)**

**CHAPTER 11**

**Adversary No. 21-A-00044 (ELF)**

**NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING**

Sharestates Intercap Line, LLC (“Sharestates Intercap”), Sharestates Investments, LLC (“Sharestates Investments”), Raymond Davoodi, Radni Davoodi and Allen Shayanfekr (collectively, the “Defendants”) have filed their Motion to Dismiss Plaintiff’s Adversary

Complaint (the “Motion”). By the Motion, Defendants seeks entry of an Order dismissing Plaintiff’s Adversary Complaint.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before September 17, 2021, you or your attorney must do all of the following:

1. File an answer explaining your position at:  
United States Bankruptcy Court,  
Judge Jean K. FitzSimon  
Robert N.C. Nix Sr. Federal Courthouse  
900 Market Street, Suite 203  
Philadelphia, PA 19107  
Phone: (215) 408-2891

and;

2. Mail a copy to the movant’s attorneys:  
  
Scott I. Unger, Esq.  
777 Township Line Road, Ste. 120  
Yardley, PA 19067-5559  
Tel. 267.907.9600/Fax 267.907.9659

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

If you or your attorney do not take the steps described in paragraphs above and attend the hearing, the court may enter an order granting the relief requested in the motion.

A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on \_\_\_\_\_, 2021 at \_\_:\_\_\_ .m. in Courtroom 1, United States Bankruptcy Court, Robert N.C. Nix Sr. Federal Courthouse , 900 Market Street, Suite 400, Philadelphia, PA 19107.

If a copy of the motion is not enclosed, a copy of the motion will be provided to you in you request a copy from the attorney named in paragraph 1(b).

You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because an answer has not been filed.

Date:

8-27-2021

By:

STARK & STARK, P.C.

SCOTT I. UNGER, ESQ.

Attorney I.D. No. 93231

777 Township Line Road, Ste. 120

Yardley, PA 19067-5559

tel. 267.907.9600/fax 267.907.9659

*Attorneys for Defendant,*